To: KHanson@ldftribe.com[KHanson@ldftribe.com]

Cc: Victorine, Gary[victorine.gary@epa.gov]; Kamke, Sherry[Kamke.Sherry@epa.gov]; Mangino,

Mario[mangino.mario@epa.gov]

From: Egan, Robert

Sent: Thur 3/10/2016 1:29:47 PM

Subject: RE: statement of work and upcoming field work (Tower Standard/Haskell Lake)

Hi Kristen,

I spoke to Mario Mangino, a Human Health Risk Assessor in the Remediation and Reuse Branch of our division. He is familiar with the site situation and the previous VI sampling at Haskell lake Lodge. Although the first round of groundwater samples indicate that the plume is not in shallow groundwater directly beneath the lodge, we continue to believe that it would be prudent to collect additional VI samples for the following reasons:

The original samples were short-term and we would like to obtain longer-term samples (the 24-hour samples currently planned);

we normally require more than one round of samples in VI evaluations;

the hotel is currently unoccupied but will be occupied again, possibly by longer-term residents, including tribal members; and

our contractor BERS will be at the site to collect VI samples at the bait shop, and inclusion of these samples would not incur much additional cost.

Mario said that we can skip the 4 indoor air samples and just do the crawl space if we wish to save some samples and the related costs. The crawl space sample results would be used as surrogates for indoor air for comparison with risk screening levels. For the bait shop, we will take an indoor air sample and a sub-slab sample.

Regarding future work, the current task order contains less overall cost than the last amendment,

providing us with the opportunity to ask to use the remaining money to fund additional work after April 18. As we discussed at our phone conference with EPA and LDF management, we plan to have a BERS field staff person present at upcoming PECFA field activities, as one way to use the remaining money.

I spoke to my contracting officer yesterday about our desire to use the remaining funds and what is available. I believe that we have the money (beyond what I we will spend for BERS to provide the oversight work) to place 1 or 2 monitoring wells and sample the wells (and possibly a limited number of other wells) in support of the USGS lake-bed work. I understand your concern about timing of the next monitoring well installation effort and having the proper data available to support the lake-bed survey. If we can obtain approval for the well installation work, we could have the wells installed and sampled in time to review the data prior to the USGS field effort.

Please let me know what you think about this plan forward. I can draft a new task order and submit it to our HQ before we go to the field on March 29.

Thank you.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

From: Hanson, Kristen [mailto:KHanson@ldftribe.com]

Sent: Wednesday, March 09, 2016 3:05 PM

To: Egan, Robert <egan.robert@epa.gov>

Cc: Dee.allen@ldftribe.com; lwawronowicz@ldftribe.com Subject: RE: statement of work and upcoming field work

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Bob,

When we last spoke you were still waiting to hear back from EPA's Risk Assessors to evaluate the vapor intrusion risk relative to the new site data collected in November and provided to EPA and the Tribe in February. Based on this data, the hotel building no longer lies within the what EPA PVI guidance terms the lateral inclusion zone. There is no dissolved plume beneath the hotel building. Both MW-17 (immediately east of the hotel) and MW-18 (North of the hotel) show no petroleum contamination above cleanup standards. In addition, the depth to groundwater is 8.5 feet, creating a vertical separation distance that screens out the building for potential Vapor Intrusion.

Unless, there is a risk I am missing (and please let me know), this work is not warranted. Also, WDNR agreed to do this work. We would rather see the precious cleanup resources be directed toward wells to delineate the plume. Also, the Tribe's USGS porewater sampling project planned for this summer was designed with wells completed.

Kristen

From: Egan, Robert [mailto:egan.robert@epa.gov]

Sent: Tuesday, March 08, 2016 7:24 AM

To: Hanson, Kristen Cc: Kamke, Sherry

Subject: statement of work and upcoming field work

Hi Kristen,

Attached is the statement of work written by the contractor for the task order I prepared. The only difference between this and what will occur is that I increased the depth of the borings to 30 feet in case we want to go deeper to investigate possible heavily contaminated zones near the source area. Work plans describing the specific tasks will be forthcoming.

Bristol has been given the go-ahead to start work. They are targeting the week of March 21 to start. Any later than that and we may not receive all the results before the end of the contract period. Bristol has asked whether late morning on March 22 is good for a meeting to discuss concerns and goals. They will be sending 2 staff, unless field work is ongoing and the geologist needs to stay at the site.

Please let me know as soon as you can about your availability. Also, we will need to provide a very quick turn-around on review and comment on the planning documents. I can forward them to you as soon as I receive them from Bristol.

I appreciate your help with all this.
Regards,
Bob
Del Fran
Bob Egan Corrective Action Manager
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